



maritime equipment, including vessels similar to the Defendant vessel herein.

5. Carver Maritime is familiar with the sources of and procedures for contracting for maritime facilities, ship bunkering services, and other necessities for vessels in the port of Charleston.
6. Carver Maritime agrees to be appointed by this Honorable Court as Substitute Custodian of the Defendant vessel.
7. Carver Maritime will accept custody of the Defendant vessel from the United States Marshal and/or the United States District Court and will safeguard such vessel, from tender until further Order of this Honorable Court, in consideration of a custodian's fee of \$800.00 per day or part thereof, plus reasonable expenses for dockage, guard service, and all other expenses directly related to said custody.
8. During custody of the vessel, it is understood that Plaintiff will advance premiums for the following insurance coverages, issued through the U.S. Marshal's policy with Johnson & Higgins of California:
  - a. Legal liability port risk hull and machinery (including P & I), naming the United States of America and the United States Marshal Service as assureds in the amount of \$1,000,000 for each risk covered; and
  - b. Legal liability port risk hull and machinery (including P & I), naming the Substitute Custodian as an assured in the amount of \$1,000,000 for each risk covered.

9. Carver Maritime will indemnify, defend, and hold harmless the U.S. Marshals Service with respect to any vicarious liability because of damage to or from vessel during the affiant's custody of vessel.
10. Carver Maritime will provide the services described above and will await sale or release of the said vessel or termination of the litigation, as this Honorable Court may order, for compensation and reimbursement of costs advanced, as in custodia legis costs.
11. The above statements are true and correct under penalty of perjury.

CARVER MARITIME, LLC

By: 

George J. McHugh,  
General Manager

RESPECTFULLY SUBMITTED BY:

COOPER & BILBREY, P.C.

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ATTORNEYS FOR PLAINTIFF,  
CARVER STEVEDORING SERVICES, INC.

April 7, 2020  
Mount Pleasant, South Carolina